

EPA Goals for Rhone Poulenc Source Control Discussion and DEQ's Addendum report

11 August 2011

Objective is protection of the Willamette River in-water remedy at or downstream of 22B

Suggested topics for today's meeting

1. Discuss groundwater and transport of hydrophobic chemicals
 - a. Presence in and the importance of NAPL; conceptual site model (CSM)
 - b. Flow paths and potential discharge points
 - c. Data gaps and/or needed analyses/calculations
 - d. Path forward to timely resolution
2. Discuss source areas in LOF (locality of facility)
 - a. Former RP source areas –insecticide area (IA), Herbicide Area (HA) DL, NDL, West Doane Lake, Northwest Property Area (NPA) .
 - b. Transport pathways – overland flow. Stormwater OF22B, and stormwater to groundwater
 - c. Data gaps. Refine CSM, Needed analyses or calculations?
 - d. Path forward to timely resolution
3. Discuss source identification
 - a. Relevance to source control – protection, alternatives, liability
 - b. Source ID need to support FS
 - c. Path forward

Goals include but not limited to:

- 1) Achieve a better understanding of DEQ's conclusion that DDX compounds are not a concern for recontaminating the river sediment
- 2) Clarify or understand how DEQ and EPA will address DDX and or D/F in the upcoming FFS and monitoring plan. See DEQ's section 5 on source control pathways and pathways for the FS
- 3) Discuss Rhone Poulenc chemicals released, which are similar/same as those being addressed by in-water actions. These chemicals have PRGs.
- 4) How best to use PRG values from RAO 4 and 8 for screening evaluations and refined CSM
- 5) Achieve a better understanding of how CDM Smith will refine previous review comments to best support the path forward to FS a work plan and monitoring work plan. i.e. will the FS include evaluation of alternatives to treat DDX? vs. performance monitoring for pesticides?

RP chemicals that COCs in the river include: DDT, DDE, DDD, chlorobenzene, Silvex, and Dieldrin, D/F